PD-0928-20

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COURT OF CRIMINAL APPEALS
AUSTIN, TEXAS
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DEANA WILLIAMSON
CLERK

IN THE COURT OF CRIMINAL APPEALS OF TEXAS

FILED COURT OF CRIMINAL APPEALS 2/12/2021 DEANA WILLIAMSON, CLERK

IJAH BALTIMORE §

§

v. § PDR NO. PD-0928-20

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STATE OF TEXAS

APPELLANT'S FIRST MOTION FOR EXTENSION OF TIME TO FILE BRIEF ON PETITION FOR DISCRETIONARY REVIEW

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

COMES NOW Appellant, by and through his Attorney of Record, and respectfully moves the Court to extend the time for filing his brief in this cause, and in support therefore would show the Court as follows:

I. Relevant Facts

On January 13, 2021, Baltimore was notified by this Court that his petition for discretionary review had been granted and that he had 30 days to timely file Appellant's Brief.

Baltimore's brief is currently due today, February 12. Counsel needs additional time to complete Appellant's Brief. For this reason, Baltimore makes this first request for one 30-day extension to file his brief with this Court.

The State has represented that it has no objection to this request.

II. Request for Extension

WHEREFORE, PREMISES CONSIDERED, Appellant Baltimore respectfully requests this Honorable Court to extend the time for filing his brief to Friday, March 12, 2021.

Respectfully submitted,

Jessica S. Freud

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Attorney for Appellant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Motion has been served on the District Attorney for McLennan County, Texas, on February 12, 2021, to Sterling.Harmon@co.mclennan.tx.us and/or Gabe.Price@co.mclennan.tx.us.

Atterney for Appellant

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JESSICA FREUD on behalf of Jessica Freud Bar No. 24095303 JESSI@FREUDLAW.COM Envelope ID: 50608146 Status as of 2/12/2021 1:07 PM CST

Associated Case Party: Barry Johnson

Name	BarNumber	Email	TimestampSubmitted	Status
Sterling Harmon		sterling.harmon@co.mclennan.tx.us	2/12/2021 10:53:40 AM	SENT